

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES & EXCHANGE COMMISSION,

Plaintiff,

- against -

WILLIAM LANDBERG, KEVIN KRAMER, STEVEN
GOULD, JANIS BARSUK, WEST END FINANCIAL
ADVISORS LLC, WEST END CAPITAL
MANAGEMENT LLC, and SENTINEL INVESTMENT
MANAGEMENT CORP.,

Defendants,

and

LOUISE CRANDALL and L/C FAMILY LIMITED
PARTNERSHIP,

Relief Defendants.

ECF Case 11 Civ. 0404 (PKC)

**ORAL ARGUMENT
REQUESTED -
NOTICE OF MOTION**

PLEASE TAKE NOTICE that, upon the accompanying Declaration of Paul K. Rooney, dated March 21, 2011, with the exhibits annexed thereto, the accompanying memorandum of law, and all prior proceedings herein, Defendant **Steven Gould** will move this Court, before the Honorable P. Kevin Castel, at the United States Courthouse, 500 Pearl Street, Courtroom 12C, New York, New York, on April ____, 2011, at 9 a.m., or as soon thereafter as counsel may be heard, for an order pursuant to Rule 12(b)(6) and Rule 9(b) of the Federal Rules of Civil Procedure to dismiss the Complaint in its entirety, and granting such other and further relief as the Court may deem just and warranted.

PLEASE TAKE FURTHER NOTICE that opposition papers must be served no later than ____, 2011.

Dated: New York, New York
March 21, 2011

Paul K. Rooney, P.C.

By: ____/s/_____
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